

October 29, 2018

Chair Mary Nichols
California Air Resources Board
1001 I St., Sacramento CA 95814

Submitted electronically via
https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=tfs2018&comm_period=N

Re: Failure to properly evaluate implications of endorsement of California Tropical Forest Standard violates the California Environmental Quality Act

Esteemed Chair Nichols:

This letter is provided as brief comment on the California Air Resources Board (CARB) draft “Criteria for Assessing Jurisdictional-scale Programs that Reduce Emissions from Tropical Deforestation” under the heading of the draft California Tropical Forest Standard (CTFS) and the accompanying Draft Environmental Analysis (Draft EA). The directors of CARB must reject the request by CARB staff for endorsement of the CTFS due to the failure to adequately assess the impacts of an endorsement of this standard. Besides the obvious absurdity of California, a state with no tropical forest ecosystems anywhere within the border of the jurisdiction, deeming itself the authority under which a “standard” regarding pollution trading based on the commodification of carbon from tropical forests should be advanced, the effort by staff to request an endorsement of a standard for use within an emissions trading system for the global aviation industry without defining, describing or evaluating the impacts of that emissions trading system in any way whatsoever is a policy overreach that far exceeds the mandate of the California Air Resources Board to address climate pollution within the state. To endorse this standard at this point in time with such inadequate information and evaluation would be extremely irresponsible and acutely exacerbates the risks presented by an already extremely high-risk policy proposal.

Failure to Address, Discuss, Describe, Define or Otherwise Assess the ICAO CORSIA Scheme in the Draft EA is Grounds to Refuse Endorsement

The CTFS is presented as a tool to be used in emissions trading systems. The future potential use of the CTFS in the California Cap-and-Trade Program (Western Climate Initiative, Inc.) is mentioned in the framing of the CTFS, but also mentioned is the International Civil Aeronautical Organization’s Carbon Offsetting Reduction Scheme for International Aviation (ICAO CORSIA). Remarkably enough, there is absolutely no effort to even describe in the most basic terms the ICAO CORSIA scheme within the available documentation. This failure to provide the most basic of information regarding ICAO CORSIA demonstrates that the draft documentation for the CTFS is deficient in scientific and technical terms. There are many serious and well-founded environmental and scientific concerns regarding the ICAO CORSIA scheme, yet the

draft documentation fails to provide the most basic information about this emissions trading scheme for which the endorsement of the CTFS is meant to serve. Thus directors have insufficient information for endorsing the standard and for understanding the implications of the endorsement of the standard.

A primary and overriding design feature that should be of tremendous concern to CARB directors is that the proposed ICAO CORSIA emissions trading system has no declining cap on emissions, and in fact is designed to allow real emissions from aviation to grow without any limit, with the intent to ostensibly “offset” this growth in emissions with emissions trading that would allow for the use of credits from tropical forest-based carbon credit projects and programs. The design of this emissions trading system must at a minimum be evaluated in order that the CARB directors have the necessary information to begin to understand what the implications are of endorsement of the CTFS.

The failure of the draft documentation and most particularly the Draft EA to even rudimentarily describe the ICAO CORSIA scheme in the most basic terms gives CARB directors no choice but to reject endorsement of the standard, because the endorsement of the CTFS would implicitly offer endorsement of the ICAO CORSIA scheme to “grow and offset” emissions – yet the CARB directors have no information whatsoever to evaluate the scientific underpinnings and environmental integrity of the ICAO CORSIA scheme. For CARB to put their stamp of approval on a tropical forest-based offset standard for use in a global emissions trading system for supposedly addressing the climate impact of the global aviation industry without having even discussed or defined the terms and design of that emissions trading system is irresponsible and greatly exceeds the authority of CARB as a California state agency. For this reason alone the endorsement of the CTFS must be rejected.

Carbon Offsets Undermine Real Innovation and Will Make Things Worse

It is unfortunate, tragic and irresponsible that in this era of egregious climate science denial that CARB directors, staff and especially the Chair remain hypnotized by the scientifically dubious utilization of carbon offsetting as a climate change mitigation tool. The ongoing reliance on and proposed use of carbon offsets in various elements of California climate policy is without scientific legitimacy and is dangerously misleading. The insinuation in the framing of the CTFS that this standard could be used for the aviation carbon offsetting plans to compensate for planned growth in emissions perpetuates on a global scale the rampant disrespect for fundamental climate science that is embodied in the California fantasy about the land sector and especially forests to be able to make up for the climate damage from the ongoing extraction and burning of fossil fuels. Informed analysis concludes that offsetting is worse than doing nothing because it almost certainly contributes to a net increase in the absolute rate of global emissions growth. It may look good on paper, but in the atmosphere such Enron carbon accounting is totally irrelevant, as it is a spurious argument that offsets reduce emissions to levels at or before those that would have transpired had the activity being offset not occurred.

A central problem with carbon offsetting is that the false promise of carbon neutrality triggers a rebound away from meaningful mitigation and towards the ongoing reliance on and development of further high carbon infrastructures at a time when a rapid and drastic transition needs to be undertaken by human society away from a high carbon economy. When offsetting is deemed to have equivalence with real emissions reductions at the source the incentive to move to lower carbon technologies, behaviors and practices is reduced accordingly. As we have already seen in California, carbon offsetting militates against market signals to improve low carbon travel and technologies, while politically facilitating the ongoing pursuit of capital-intensive development of high-carbon infrastructure.

To be clear, the fundamental premise behind the California Tropical Forest Standard, the idea that it is possible to “neutralize” the emissions from burning fossil fuels with carbon sequestration or avoided emissions in forest ecosystems, is based on erroneous assumptions and irredeemably flawed science regarding the atmospheric impacts of human disruption of global carbon cycles. Fundamental land carbon science is clear in describing how fossil fuel emissions are essentially a one-way injection of carbon into the atmosphere and cannot be compensated for by the land sector in any meaningful way. In this age of egregious climate science denial, it remains exceptionally dangerous that the State of California and the proponents of including CTFS/REDD-based offsets in emissions trading systems such as the ICAO CORSIA or the California Cap-and-Trade Program continue perpetuating a scientifically questionable policy proposal and as such from their pulpit perpetuate a nefarious species of exceptionally dangerous soft climate science denial. It is necessary for the State of California to finally move on from this high risk and dubious scheme, and as such it is essential that the CARB directors reject the endorsement that CARB staff are requesting of the California Tropical Forest Standard.

Conclusion

Due to the lack of adequate analysis and the failure of CARB staff to provide the CARB directors with the necessary information to understand the implications and potential impacts of an endorsement of the CTFS it is necessary for CARB directors to reject endorsement of the standard.

Respectfully,



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